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ATTORNEYS

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January 20, 2012

Ms. Jocelyn Boyd  
Chief Clerk and Administrator  
South Carolina Public Service Commission  
Synergy Business Park, The Saluda Building  
101 Executive Center Drive  
Columbia, South Carolina 29210

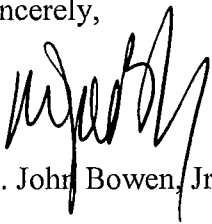
Re: Application of Chem-Nuclear Systems, LLC for Adjustment in the  
Levels of Allowable Costs and for Identification of Allowable Costs  
**Docket No. 2000-366-A**

Dear Ms. Boyd:

Enclosed for filing on behalf of Chem-Nuclear Systems, LLC is a Motion to Withdraw and Substitute Counsel removing M. John Bowen, Jr. and Margaret M. Fox of McNair Law Firm, P. A. and adding Sara S. Rogers and J. David Black of Nexsen Pruet, LLC as counsel of record in this matter.

Please contact me if you have any questions regarding this filing.

Sincerely,



M. John Bowen, Jr.

MJB Jr./rwm  
Enclosure

McNair Law Firm, P. A.  
1221 Main Street  
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BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Docket No. 2000-366-A

In re: Application of Chem-Nuclear Systems,     )  
      LLC for Adjustment in the Levels of        )  
      Allowable Costs and for Identification     )  
      of Allowable Costs                            )  
\_\_\_\_\_ )

**MOTION TO WITHDRAW AND TO SUBSTITUTE COUNSEL**

M. John Bowen, Jr. and Margaret M. Fox of McNair Law Firm, P.A. ("McNair Counsel"), counsel for Chem-Nuclear Systems, LLC ("Applicant") in the above-referenced proceeding, hereby move for permission to withdraw as counsel of record, and to substitute Sara S. Rogers of Nexsen Pruet, LLC as counsel of record for Applicant in this matter. In support of the Motion, we would respectfully show:

1. On September 28, 2011, the Application in this matter was filed with the Commission. McNair Counsel signed the Application as counsel of record for Applicant.
2. Applicant's testimony in this matter is due on March 8, 2012. A hearing has been scheduled in this matter for April 19, 2012 at 10:30 a.m. The withdrawal of McNair Counsel and substitution of Ms. Rogers as counsel of record for the Applicant can be accomplished without material adverse effect on Applicant, and no scheduled hearing will be delayed by granting this motion to withdraw.
3. Applicant is aware that counsel will be substituted in this matter. Applicant has a long-standing attorney-client relationship with Ms. Rogers, who has recently left the McNair

Law Firm and joined the law firm of Nexsen Pruet. Applicant has directed that all client files, including the file in this matter, be delivered to Ms. Rogers at Nexsen Pruet.

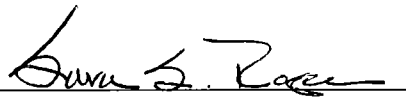
4. Upon the withdrawal of McNair Counsel, Ms. Rogers and Mr. Black will serve as counsel of record for Applicant in this proceeding.

WHEREFORE, M. John Bowen, Jr. and Margaret M. Fox of McNair Law Firm, P.A., respectfully request permission to withdraw as counsel of record for the Applicant, and Sara S. Rogers and J. David Black of Nexsen Pruet, LLC further request to be substituted as counsel for the Applicant in this proceeding.

Respectfully submitted this 20<sup>th</sup> day of January, 2012.



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BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

Docket No. 2000-366-A

IN RE:    Application of Chem-Nuclear Systems, LLC    )  
          for Adjustment in the Levels of Allowable    )  
          Costs and for Identification of Allowable    )  
          Costs    )  
          \_\_\_\_\_ )

**CERTIFICATE  
OF SERVICE**

I, Rebecca W. Martin, do hereby certify that I have this date served one (1) copy of the Motion To Withdraw And To Substitute Counsel for Chem-Nuclear Systems, LLC upon the following parties of record by causing said copies to be deposited with the United States Postal Service, first class postage prepaid and properly affixed thereto, and addressed as follows:

The Honorable Alan Wilson  
c/o Parkin Hunter, Esquire  
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Frank R. Ellerbe, III, Esquire  
Bonnie D. Shealy, Esquire  
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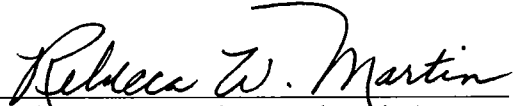
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January 20, 2012

Columbia, South Carolina